Mr. Phil McKittrick
Polyfoam Packers Corporation
955 Woodland Avenue
Michigan City, IN 46360

Re: 091-12933-00079
Minor Source Modification to:
Part 70 permit No.: T091-7666-00079

Dear Mr. Mc Kittrick:

Polyfoam Packers Corporation was issued Part 70 operating permit T091-7666-00079 on October 14, 1999 for stationary polystyrene shape molding operations. An application to modify the source was received on November 2, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall

not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. The source must comply with the requirements of 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12 before operation of any of the proposed emission units can begin.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call Lisa M. Wasiowich at (973) 575-2555 x3206, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
LMW/EVP
cc: File - LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Polyfoam Packers Corporation
955 Woodland Avenue
Michigan City, Indiana 46360

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-7666-00079	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: October 14, 1999

First Administrative Amendment 091-11627-00079	Pages Affected: 5, 6, 29, 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: January 18, 2000

First Minor Source Modification 091-12933-00079	Pages Affected: 3, 4, 6, 30, 31, 31a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)]
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection
C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - One boiler rated 10.5 MMBtu/hr

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 Particulate Matter (PM) [326 IAC 6-2-4]

Compliance Determination Requirements
D.1.2 Testing Requirements [326 IAC 2-7-6(1)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.1.3 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.1.4 Record Keeping Requirements [40 CFR part 60.48c]

D.2 FACILITY OPERATION CONDITIONS - Pre expanders and molding equipment

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]
D.2.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]
D.2.3 New Facilities, General Reduction Requirements [326 IAC 8-1-6]
D.2.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

Compliance Determination Requirements
D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.2.6 Record Keeping Requirements
D.2.7 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - One (1) boiler rated at 8.4 MMBtu/hr

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Compliance Determination Requirements
D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.3 Monitoring

Certification Form
Emergency/Deviation Occurrence Report
Part 70 Quarterly Report
Quarterly Compliance Monitoring Report

10) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

11) One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.

12) One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

13) Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

14) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

15) One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

16) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

17) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

18) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

19) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

20) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

21) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

22) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

23) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

24) One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the molding process shall use no more than 26.77 tons per month of pentane (VOC) (at 77.5% flash off). This usage limit is required to limit the potential to emit of VOC to 20.75 tons per month. Compliance with this limit makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.2.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the best available control technology (BACT) for the expandable polystyrene molding process shall be the use of the lowest available pentane content material without add-on control equipment. Also, the Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

D.2.3 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

BACT - The OAM, IDEM has determined the BACT for the pre expander, rated at 500 pounds per hour and # 2 pre expander, rated at 1500 pounds per hour shall be as follows:

(a) The molding compound shall contain a maximum average of 5.5% pentane.

(b) Polyfoam will continue to work with resin suppliers to seek to obtain resins with lower VOC content. Polyfoam will also continue to evaluate the alternate materials.

(c) The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

Any change or modification that will cause VOC emissions from the molding press identified as P001, to be equal to or greater than 25 tons per year shall require IDEM, OAM approval before such changes can take place.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.6 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.4.

(1) The amount and VOC content of expandable polystyrene molding compound. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(c) To document compliance with Condition D.2.3, the Permittee shall maintain records of the average monthly pentane content which shall be less than 5.5%.

D.2.7 Reporting Requirements

a) A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

b) To document compliance with Condition D.2.2 and D.2.3 the Permittee shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous years search, and schedule of switching material with lower pentane and VOC content if the material is available.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a for a Minor Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Polyfoam Packers Corporation**
Source Location:	**955 Woodland Avenue, Michigan City, IN, 46360**
County:	**LaPorte**
SIC Code:	**3086**
Operation Permit No.:	**T091-7666-00079**
Operation Permit Issuance Date:	**October 14, 1999**
Source Modification No.:	**Minor Source Modification 091-12933-00079**
Permit Reviewer:	**Lisa M. Wasiowich/EVP**

The Office of Air Management (OAM) has reviewed a modification application from Polyfoam Packers Corporation relating to the operation of molding expandable polystyrene compound into shape molded products.

History

On November 2, 2000, Polyfoam Packers Corporation submitted an application to the OAM requesting to add an additional molding press to their existing plant. Polyfoam Packers Corporation was issued a Part 70 permit on October 14, 1999. This source was also issued an administrative amendment on January 18, 2000.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

(a) One (1) molding press, model number 1317, identified as P001,rated at 600 pounds per hour, and exhausting to stack S-28.

Existing Approvals

The source was issued a Part 70 Operating Permit (T091-7666-00079) on October 14, 1999. The source has since received the following:

(a) First Administrative Amendment No.: 091-11627, issued on January 18, 2000.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
S-28	molding press	26	.5	unknown	155

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 2, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, page 1)

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	15.85
CO	0.0
NO_x	0.0

Justification for Modification

The Title V permit is being modified through a Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4), because the potential to emit VOC is less than 25 tons per year and greater than 5 tons per year. An Administrative Amendment will be issued and will incorporate the source modification into the Part 70 permit and give the source approval to operate the new emission units.

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone.

Potential to Emit After Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Existing Title V Source	45.99	0.0	0.0	249	0.0	0.0	0.0
Modification (molding press)	0.0	0.0	0.0	see note below*	0.0	0.0	0.0
Total Emissions	45.99	0.0	0.0	249	0.0	0.0	0.0

*The source has agreed to maintain the VOC limit of less than 249 tons per year even with the addition of the new molding press to their existing operation. Thus, the source will still maintain its PSD minor source status.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because the source has PTE of any HAP less than 10 tons per year and PTE of any combination of HAPs less than 25 tons per year. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The potential VOC emissions for the proposed molding press are less than 25 tons per year. Therefore the requirements of 326 8-1-6 do not apply to this unit. Any change or modification that may cause the VOC emissions from this press to be equal to or greater than 25 tons per year shall require IDEM, OAM approval before such changes can occur.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance requirements for the equipment covered under this approval.

Changes Proposed

The new molding press is being added to Section A.2 as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

1) One (1) boiler, model number CB 700-250, fueled by natural gas, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1

2) Twenty-four (24) foam polystyrene storage silos with a total maximum storage capacity of 60,000 pounds.

3) One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

4) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.

5) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.

6) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.

7) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.

8) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.

9) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

10) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

11) One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.

12) One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

13) Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

14) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

15) One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

16) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

17) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

18) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

19) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

20) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

21) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

22) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

23) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

24) One (1) molding press, model number 1317, identified as P001,rated at 600 pounds per hour, and exhausting to stack S-28.

The new molding press is being added to the facility description in Section D.2 as follows:

Facility Description [326 IAC 2-7-5(15)]

Twenty-four (24) foam polystyrene storage silo with a maximum storage silo with a maximum storage capacity of 60,000 pounds.

One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.

One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21. One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22. One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23. One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24. One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25. One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26. One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27. **One (1) molding press, model number 1317, identified as P001,rated at 600 pounds per hour, and exhausting to stack S-28.**

A new Condition D.2.4 has been added as follows:

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

Any change or modification that will cause VOC emissions from the molding press identified as P001, to be equal to or greater than 25 tons per year shall require IDEM, OAM approval before such changes can take place.

The numbering of the existing D.2.4, D.2.5, D.2.6 conditions, and the title page was changed as a result of this addition.

The following changes were made to Condition D.2.5 (now re-numbered D.2.6) to require record keeping for the new molding press to show compliance with the new Condition D.2.4:

D.2.5~~6~~ Record Keeping Requirements

(a) To document compliance with Condition**s** D.2.1 **and D.2.4**, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition**s** D.2.1 **and D.2.4**.

Conclusion

The operation of this facility using expandable polystyrene molding compound into shape molded products shall be subject to the conditions of the attached proposed **Minor Source Modification No. 091-12933-00079**.

Appendix A: Emission Calculations

Company Name: Polyfoam Packers Corp.
Address City IN Zip: 955 Woodland Avenue, Michigan City, IN 46360
CP: 091-12933
Plt ID: 091-00079
Reviewer: Lisa M. Wasiowich
Date: December 7, 2000

Emissions from proposed mold press

material: expandable polystyrene with 7.0% pentane by weight
maximum throughput: 600.0 pounds per hour

	7.00%	*	600.00	=	42.00	pounds of pentane per hour
pre-expander	24.00%	of pentane released				
	0.76	*	42.00	=	31.92	pounds of pentane per hour remaining
storage silos	19.00%	of pentane released				
	0.81	*	31.92	=	25.86	pounds of pentane per hour remaining
shape mold presses	14.00%	of pentane released				
	0.14	*	25.86	=	3.62	pounds of pentane per hour released
	3.62	*	8760 / 2000	=	15.85	tons per year of pentane released by shape mold press